

Facility Name Olin Hunt  
EPA I.D.# P-1095976541  
Facility Rep. Al Therrien  
Inspector JLMC  
Date 6-14-90

RCRA LAND DISPOSAL RESTRICTIONS

GENERATOR COMPLIANCE

Restricted Waste Identification

1. F-Solvent Identification

Waste Handled	Specific Wastes
F001 _____	_____
F002 <u>✓</u> _____	<u>ACETONE</u> _____
F003 <u>✓</u> _____	<u>XYLENE</u> _____
F004 _____	_____
F005 _____	_____

Have F-solvent wastes been properly identified? ✓ Y \_\_\_\_\_ N

(Note: F003 wastestream listed solely for ignitability mixed with a non-restricted solid or hazardous waste and still exhibits ignitability characteristic is subject to the LDR.)

2. Dioxin Identification N/A

Waste Handled		
F020 _____	F023 _____	F028 _____
F021 _____	F026 _____	
F022 _____	F027 _____	

3. California List Identification

Liquid wastes with cyanides $\geq 1000$ mg/l	<u>N</u>
Liquid wastes with metals or compounds $\geq$ :	
arsenic 500 mg/l	<u>N</u>
cadmium 100 mg/l	<u>N</u>
chromium VI 500 mg/l	<u>N</u>
lead 500 mg/l	<u>N</u>
mercury 20 mg/l	<u>N</u>
nickel 134 mg/l	<u>N</u>
selenium 100 mg/l	<u>N</u>
thallium 130 mg/l	<u>N</u>
Liquid wastes having a pH $\leq 2$	<u>N</u>
Liquid wastes containing PCBs	
$\geq 50$ ppm	<u>N</u>
$\geq 500$ ppm	<u>N</u>
Liquid wastes $\geq 1000$ mg/l of	
Halogenated Organic Compounds (HOCs)	<u>N</u>
Non-liquid wastes $\geq 1000$ mg/kg of HOCs	<u>N</u>

Does the generator handle D002 (corrosive), D004-D011 (EP toxic) or any other wastes that may be subject to the California list standards? [268.7(a)]

Explain below.

Has the generator conducted the paint filter liquids test (Method 9095) to determine if the California list waste is liquid? [268.32(i)]

\_\_\_\_\_Y \_\_\_\_\_N

N/A

#### 4. First and Second Third Wastes

Does the generator handle any of the following wastes, which are subject to treatment standards?

F006	F007	F008	F009	F010	F011	F012	F024	K001	K005	K007	K009	K010
K011	K013	K014	K015	K016	K018	K019	K020	K021	K022	K023	K024	K025@
K027	K028	K029	K030	K036	K037	K038	K039	K040	K043	K044	K045	K046
K047	K048	K049	K050	K051	K052	K060	K061	K062	K069	K071	K083	K086
K087	K093	K094	K095	K096	K099	K100	K101	K102	K103	K104	K113	K114
K115	K116	P013	P021	P029	P030	P039	P040	P041	P043	P044	P062	P063
P071	P074	P085	P089	P094	P097	P098	P099	P104	P106	P109	P111	P121
U028	U058	U069	U087	U088	U102	U107	U190	U221	U223	U235		

@ K025 nonwastewaters that were disposed of prior to August 17, 1988 are not regulated by LDR.

Does the generator handle any of the following wastes, which are subject to the soft hammer demonstration?

F006*	F019	K004*	K008*	K011*	K013*	K014*	K017	K021*	K022*	K025*	K029*	K031
K035	K041	K042	K046*	K060*	K061*	K069*	K073	K083*	K083**	K084	K085	K086***
K095*	K096*	K097	K098	K101+	K102+	K105	K106	P001	P002	P003	P004	P005
P007	P008	P010	P011	P012	P014	P015	P016	P018	P020	P026	P027	P036
P037	P048	P049	P050	P054	P057	P058	P059	P060	P066	P067	P068	P069
P070	P072	P081	P082	P084	P087	P092	P102	P105	P107	P108	P110	P112
P113	P114	P115	P120	P122	P123	U002	U003	U005	U007	U008	U009	U010
U011	U012	U014	U015	U016	U018	U019	U020	U021	U022	U023	U025	U026
U029	U031	U032	U035	U036	U037	U041	U043	U044	U046	U047	U049	U050
U051	U053	U057	U059	U060	U061	U062	U063	U064	U066	U067	U070	U073
U074	U077	U078	U080	U083	U086	U089	U092	U093	U094	U095	U097	U098
U099	U101	U103	U105	U106	U108	U109	U110	U111	U114	U115	U116	U119
U122	U124	U127	U128	U129	U130	U131	U133	U134	U135	U137	U138	U140
U142	U143	U144	U146	U147	U149	U150	U151	U154	U155	U157	U158	U159
U161	U162	U163	U164	U165	U168	U169	U170	U171	U172	U173	U174	U176
U177	U178	U179	U180	U185	U188	U189	U192	U193	U196	U200	U203	U205
U206	U208	U209	U210	U211	U213	U214	U215	U216	U217	U218	U219	U220
U226	U227	U228	U237	U238	U239	U244	U248	U249				

\* Wastewaters from these wastes are subject to the soft hammer provisions.

\*\* K083 wastes with detectable ash are subject to the soft hammer provisions.

\*\*\* K086 wastes in the solvent sludges subcategory or the caustic/washwater and sludges subcategory are subject to the soft hammer provisions.

@ K025 nonwastewaters that were disposed of prior to August 17, 1988 are not regulated by LDR.

+ K101 and K102 nonwastewater wastes in the high arsenic subcategory are subject to the soft hammer provisions.

Are any of the soft-hammer wastes also California list wastes? \_\_\_\_\_Y \_\_\_\_\_N

(Note: See Appendix A for a listing of California list waste constituents likely to be found in soft-hammer wastes.) Note below.

## Recycling Operations

1. Are any of the generator's LDR wastes recycled: onsite? Y ✓ N  
offsite? Y ✓ N

If yes, describe recycling process.

2. Were treatment residuals generated from these recycling processes? N/A  
Y N

Note: The treatment residuals generated from recycling are potentially subject to the land ban. Since the waste residuals are derived from the wastes, they retain the same waste codes as the wastes and are therefore subject to the land ban. The residuals require notifications, certifications, etc. and possibly, further treatment, like any other waste subject to the land ban.

## Waste analysis (See treatment standards in Appendix B.)

1. Did generator determine that its wastes are subject to the LDR? ✓ Y N

If yes, how?

Knowledge of wastes	<u>✓</u> Y	<u>✓</u> N
TLCP	<u>Y</u>	<u>✓</u> N
Total Waste Analysis	<u>Y</u>	<u>✓</u> N
Other	<u>Y</u>	<u>✓</u> N

Explain for each restricted waste:

Describe content and basis of applied knowledge:

[268.7(a)] obtain copies of supporting documentation

If determined by TLCP, or total constituent analysis, provide date of last test, frequency of testing and attach test results (if questionable)  
obtain copies of all analyses results

2. Does the generator determine whether the waste exceeds treatment standards? Y ✓ N

Do wastes exceed applicable treatment standards upon generation? [268.7(a)(1)]

✓ Y N

If Yes, indicate which wastes below.

F003, F002

3. Has the generator conducted any testing or applied knowledge of the soft hammer wastes to determine whether the concentrations qualify the wastes as California list wastes?

Explain below:

Y ✓ N

BDAT Treatment Standard Determination

1. For F-solvents, did the company determine the waste treatability group? ✓ Y     N

Which waste treatability group was chosen?

Wastewaters containing F001 - F005 solvents

All other spent F001 - F005 solvents ✓

[Wastewaters are defined as F001 - F005 wastes that are primarily water and contain either <1% total organic carbon or <1% total solvents (constituents for which the waste was listed)].

2. For first and second third wastes, did the company determine the waste treatability group? N/A     Y     N

Which waste treatability group was chosen?

Wastewaters    

Nonwastewaters    

[Wastewaters are defined as wastes that contain <1% total organic carbon and <1% total suspended solids (i.e. total filterable solids)].

3. Did the generator correctly determine the treatability groups? [268.41(a) or 268.43]

For F-solvents? ✓ Y     N

For First and Second Third wastes?     Y     N

Please explain (specify which groups for which wastes)

4. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard? (based on review of process operation, pipe routing, and point of sampling)? [268.3]     Y ✓ N

Please explain.

5. Did the generator mix wastes with differing treatment standards?     Y ✓ N

If so, did the generator select the most stringent treatment standard for each constituent? [268.41(b)]     Y     N

## Offsite Management

1. For all restricted wastes, did the generator provide LDR notifications to the facility(ies) receiving the restricted wastes? [268.7(a)(1)]? ☒ Y ☐ N

If no, for which wastes were no notifications provided?

2. Did the LDR notification contain: [268.7(a)(1) or (a)(2)(i)]

EPA waste number	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Applicable treatment standard	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Manifest number	<input checked="" type="checkbox"/> Y	<input type="checkbox"/> N
Waste Analysis date, if available	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N

(Note: After August 17, 1988, notifications must be retained by the generator.)

3. If the restricted wastes did not exceed treatment standards, did the generator provide to all receiving facilities the certification stating that the waste meets treatment standards? [268.7(a)(2)]? ☒ N/A ☐ Y ☐ N

Obtain copies of certification

4. Is any of the generator's waste subject to a:

national capacity extension (NCE)?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
case by case extension?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N
no migration petition?	<input type="checkbox"/> Y	<input checked="" type="checkbox"/> N

If yes:

For which wastes?

Did the generator submit to receiving facility the appropriate LDR notifications with each shipment, containing the following information? [268.7(a)(3)]

EPA waste number	<input type="checkbox"/> Y	<input type="checkbox"/> N
Applicable treatment standard	<input type="checkbox"/> Y	<input type="checkbox"/> N
Manifest number	<input type="checkbox"/> Y	<input type="checkbox"/> N
Waste Analysis date, if available	<input type="checkbox"/> Y	<input type="checkbox"/> N
Wastes subject to extension/petition	<input type="checkbox"/> Y	<input type="checkbox"/> N
Dates when waste is subject to LDR	<input type="checkbox"/> Y	<input type="checkbox"/> N

5. Did the generator retain copies of all notifications/certifications sent with each manifest to offsite facilities? [268.7(a)(6)] ☒ Y ☐ N

Obtain completed copy of notification.

6. For each "soft hammer" waste generated, did the generator do the following:  
[268.7(a)(4)&(6)/268.8]

Submit a demonstration to the Regional Administrator prior to initial shipment of the waste directly or indirectly to a landfill or surface impoundment?  
[268.8(a)(2)]

\_\_\_\_ Y \_\_\_\_ N

Submit a copy of the demonstration to the receiving facility upon initial shipment of the waste? [268.8(a)(3)&(4)]

☒ Y \_\_\_\_ N

Retain a copy of the demonstration? [268.8(a)(3)]

☒ Y \_\_\_\_ N

Send a copy of the soft hammer certification to the receiving facility with each subsequent shipments? [268.8(a)(3)]

☒ Y \_\_\_\_ N

Retain a copy of each soft hammer certification for all subsequent shipments?  
[268.7(a)(6)]

☒ Y \_\_\_\_ N

7. Has the Regional Administrator invalidated the soft hammer demonstration?

\_\_\_\_ Y ☒ N

If yes, has the generator ceased shipment of the wastes? [268.8(b)(3)]

\_\_\_\_ Y \_\_\_\_ N

Do records indicate that the generator has informed all receiving facilities of the invalidation? obtain supporting documentation [268.8(b)(3)]

\_\_\_\_ Y \_\_\_\_ N

8. Identify (including EPA I.D. #) all offsite facilities receiving restricted wastes:

Complete TSD checklist if waste is stored for more than 90 days  
or if treatment is conducted on-site.

Checklist valid through May 8, 1990

N/A

Facility Name \_\_\_\_\_  
EPA ID # \_\_\_\_\_  
Facility Rep. \_\_\_\_\_  
Inspector \_\_\_\_\_  
Date \_\_\_\_\_

RCRA LAND DISPOSAL RESTRICTIONS

STORAGE FACILITY COMPLIANCE

1. Are restricted wastes which exceed treatment standards being stored onsite for greater than 90 days? \_\_\_\_\_Y \_\_\_\_\_N

If yes, which wastes?

(Note: Wastes subject to extensions to the effective dates of the regulations are excluded from the storage requirements.)

2. Are all containers clearly marked to identify: [268.50(a)(2)(i) & (ii)]

Content? \_\_\_\_\_Y \_\_\_\_\_N  
Date of Accumulation? \_\_\_\_\_Y \_\_\_\_\_N

3. Do the operating records track: [264.73, 265.73 and 268.50(a)(2)(ii)]

Location of waste? \_\_\_\_\_Y \_\_\_\_\_N  
Type of waste? \_\_\_\_\_Y \_\_\_\_\_N  
Quantity? \_\_\_\_\_Y \_\_\_\_\_N  
Date entered storage? \_\_\_\_\_Y \_\_\_\_\_N  
Date removed from storage? \_\_\_\_\_Y \_\_\_\_\_N

4. Do the operating records agree with container labelling? [268.50(a)(2), 264.73 and 265.73] \_\_\_\_\_Y \_\_\_\_\_N

5. Are the restricted wastes in storage for less than 1 year? \_\_\_\_\_Y \_\_\_\_\_N  
If stored  $\geq$  1 year, why?

(Note: LDR Wastes may be stored for more than a year if such storage is solely for the purpose of accumulation of quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal (e.g. enough waste to make up a load of waste). The burden of proof is on the facility for storage over one year.) [268.50(c)]

6. Was the waste analysis plan revised to cover land ban requirements for: [268.7(b), 264.13 and 265.13]

Incoming wastes?

☐ Y ☐ N ☐ N/A

Outgoing wastes?

☐ Y ☐ N ☐ N/A

7. What is the frequency of testing?

8. What types of analyses are conducted for which wastes?

If facility stores only wastes generated onsite, complete generator checklist and stop here.

If facility accepts wastes for storage, complete remainder of checklist.

9. What, if any, procedures are used to identify discrepancies in manifests? (such as wastes previously designated as F-wastes being shipped as D wastes)

10. Do the operating records include: [264.73, 265.73 and 268.8(c)]

LDR notifications?

☐ Y ☐ N

Waste analysis data?

☐ Y ☐ N

Soft hammer demonstrations/certifications received from generators, storage, and/or treatment facilities?

Explain:

☐ Y ☐ N

#### Further Offsite Management

1. For restricted wastes, did the storage facility provide LDR notifications to the facility(ies) receiving the restricted wastes? [268.7(a)(6)/268.7(a)(1)]?

☐ Y ☐ N

2. Did the LDR notification contain: [268.7(a)(1) or (a)(2)(i)]

EPA waste number

☐ Y ☐ N

Applicable treatment standard

☐ Y ☐ N

Manifest number

☐ Y ☐ N

Waste Analysis date, if available

☐ Y ☐ N

(Note: After August 17, 1988, notifications must be retained by the generator - in this case o/o.)

3. If the restricted wastes did not exceed treatment standards, did the storage facility provide to all receiving facilities the certification from the generator stating that the waste meets treatment standards? [268.7(a)(2)]?

☐ N/A ☐ Y ☐ N

Obtain copies of certification

4. Is any of the waste handled by storage facility subject to a:

national capacity extension (NCE)?	<input type="checkbox"/> Y	<input type="checkbox"/> N
case by case extension?	<input type="checkbox"/> Y	<input type="checkbox"/> N
no migration petition?	<input type="checkbox"/> Y	<input type="checkbox"/> N

If yes:

For which wastes?

Did the generator submit to receiving facility the appropriate LDR notifications with each shipment, containing the following information?  
[268.7(a)(3)]

EPA waste number	<input type="checkbox"/> Y	<input type="checkbox"/> N
Applicable treatment standard	<input type="checkbox"/> Y	<input type="checkbox"/> N
Manifest number	<input type="checkbox"/> Y	<input type="checkbox"/> N
Waste Analysis date, if available	<input type="checkbox"/> Y	<input type="checkbox"/> N
Wastes subject to extension/petition	<input type="checkbox"/> Y	<input type="checkbox"/> N
Dates when waste is subject to LDR	<input type="checkbox"/> Y	<input type="checkbox"/> N

5. For soft hammer wastes, did the o/o provide with each shipment to receiving facility, a copy of the soft hammer certification provided by the generator?  
[268.8(c)(2)] ☐ Y ☐ N

6. Did the o/o retain copies of notifications/certifications sent with each manifest to offsite facilities? [268.7(a)(6)] ☐ Y ☐ N

Obtain completed copy of notification.

7. Identify (including EPA I.D. #) all offsite facilities receiving restricted wastes:

Checklist valid through May 8, 1990

Facility Name \_\_\_\_\_  
EPA ID # \_\_\_\_\_  
Facility Rep. \_\_\_\_\_  
Inspector \_\_\_\_\_  
Date \_\_\_\_\_

RCRA LAND DISPOSAL RESTRICTIONS

TREATMENT FACILITY COMPLIANCE

1. Are restricted wastes which exceed treatment standards treated onsite?  
[268.7(b)] \_\_\_\_\_Y \_\_\_\_\_N

Describe the treatment process(es):  
(Consider: Was dilution used as a substitute for treatment?)

2. What, if any, procedures are used to identify discrepancies in manifests?  
(such as wastes previously designated as F-wastes being shipped as D wastes)

3. Was the waste analysis plan revised to cover land ban requirements for:  
[264.13 and 265.13]

Incoming wastes? \_\_\_\_\_Y \_\_\_\_\_N \_\_\_\_\_N/A  
Outgoing wastes? \_\_\_\_\_Y \_\_\_\_\_N

4. What is the frequency of testing for incoming wastes?

What types of analyses are conducted on the incoming wastes?

5. What is the frequency of testing for outgoing wastes?

What types of analyses are conducted on the treated (outgoing) wastes where  
treatment standards have been set for waste extracts? [268.7(b)]

What types of analyses are conducted for the treated (outgoing) wastes where treatment standards have been set for the waste residues? [268.7(b)]

6. Where is the testing taking place?

7. Do the operating records include the following information provided by the generator, treatment or storage facility: [264.73, 265.73 and 268.8(c)]

LDR notifications?	_____Y	_____N
Waste analysis data?	_____Y	_____N
Soft hammer demonstrations/certifications?	_____Y	_____N

Explain:

8. Are the proper notifications and certifications (for wastes other than soft hammer wastes) sent to next facility receiving the treatment residues (land disposal or facility conducting further treatment)?

\_\_\_\_\_Y \_\_\_\_\_N

If Yes, do the notifications and certifications include the following:  
[268.7(b)(4)&(5)]

EPA waste number?	_____Y	_____N
Applicable treatment standard?	_____Y	_____N
Manifest number?	_____Y	_____N
Waste analysis date, if available?	_____Y	_____N
Certification statement, if applicable?	_____Y	_____N

9. Does the facility treat soft hammer waste? \_\_\_\_\_Y \_\_\_\_\_N

If Yes, does the treatment occur as described in the generator's demonstration? [268.8(c)(1)] \_\_\_\_\_Y \_\_\_\_\_N

Did the treatment facility certify that the soft hammer waste was treated as per the generator's demonstration? \_\_\_\_\_Y \_\_\_\_\_N

Did the treatment facility maintain copies of all soft hammer certifications? [268.8(c)(1)] \_\_\_\_\_Y \_\_\_\_\_N

Did the treatment facility send a copy of the generators soft hammer demonstration and certification to the receiving TSDF? [268.8(c)(2)] \_\_\_\_\_Y \_\_\_\_\_N

Checklist valid through May 8, 1990



Olin Hunt Specialty Products Inc.  
A Subsidiary of Olin Corporation  
One Wellington Road  
Lincoln, Rhode Island 02865  
Telephone: 401-333-6114

OL



February 9, 1990

USEPA - Region 1  
Room 2203 JFK Building  
Boston, Massachusetts 02203

ATTN: Regional Administrator

Dear Regional Administrator:

This letter serves as demonstration and certification required in  
40 CFR 268.8(a)1.

Olin Hunt Specialty Products, Inc., One Wellington Road, Lincoln, RI  
generates the following soft-hammer wastes and ships them to ThermalKEM  
located in Rock Hill, South Carolina for incineration. The "soft-hammer  
wastes" generated are:

UOL U077 1,2-Dichloroethane

In search for the acceptable treatment facility for these materials, the  
following facilities have been contacted with the assistance of our  
environmental service company:

BDT, Inc.  
4255 Research Parkway  
Clarence, NY 14031  
(716) 759-2868  
Contact: Nancy Beebe

FEB 21 90

RECEIVED WASTE  
MANAGEMENT

Trade Waste Incineration  
Seven Mobile Drive  
Sauget, IL 62201  
(618) 271-2804  
Contact: Mark Motylewski

SCA Chemical Services, Inc.  
11700 South Stony Island  
Chicago, IL 60617  
(312) 646-5700  
Contact: Mark Motylewski



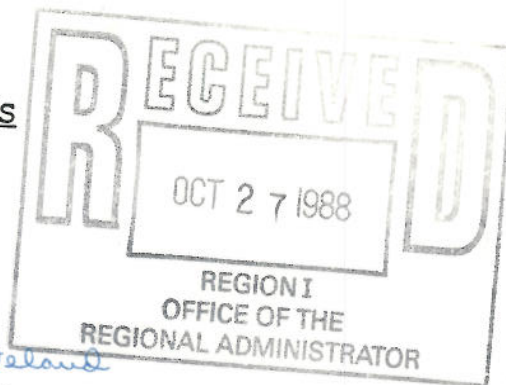
INCINERATION STREAMS

Regional Administrator  
U. S. Environmental Protection Agency  
Region I

JFK Building (Federal)  
RAA-2203

Boston, Ma 02203

att: Michael Deland



Re: Section 268.8(a)(2)(ii) Demonstration and Certification

Dear Mr. Deland:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

It is submitted in connection with a hazardous waste stream generated at this facility. The stream is classified by EPA waste code number 4012, which is a "first third" "soft hammer" waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit.

Because this stream is an organic stream (see attached waste stream chemical description), the greatest environmental benefit would be provided by RCRA-authorized incineration which destroys the hazardous constituents. Since such treatment is available, we have contracted with a RCRA authorized incineration facility for treatment of the waste by incineration. That facility is Rollins Environmental Services (NY) Inc. (EPA ID Number NJD053288239).

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Alan Cantano

RECEIVED

OCT 27. 88

ME & VT WASTE  
MANAGEMENT BRANCH



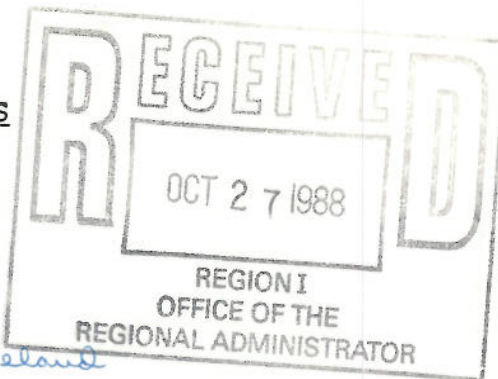
INCINERATION STREAMS

Regional Administrator  
U. S. Environmental Protection Agency  
Region I

JFK Building (Federal)  
RAA-2203

Boston, Ma 02203

att: Michael Deland



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Because this stream is an organic stream (see attached waste stream chemical description), the greatest environmental benefit would be provided by RCRA-authorized incineration which destroys the hazardous constituents. Since such treatment is available, we have contracted with a RCRA authorized incineration facility for treatment of the waste by incineration. That facility is Rollins Environmental Services (NY) Inc. (EPA ID Number NJD053288239).

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Alan Cantano

RECEIVED

OCT 27 88

ME & VT WASTE  
MANAGEMENT BRANCH



0K

INCINERATION STREAMS

Regional Administrator  
U. S. Environmental Protection Agency  
Region I

JFK Federal Building  
RAA-2203

Boston, Ma 02203

attn: Michael Deland

Re: Section 268.8(a)(2)(ii) Demonstration and Certification

Dear Mr. Deland:

This demonstration and certification is submitted pursuant to 40 CFR 268.8(a)(2)(ii).

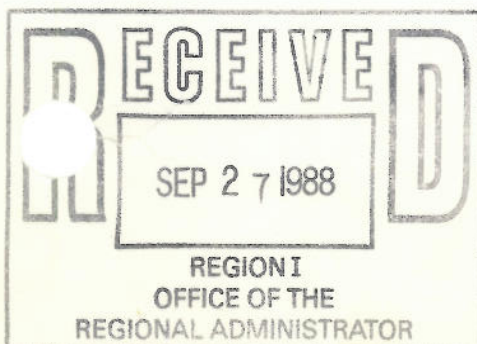
It is submitted in connection with a hazardous waste stream generated at this facility. The stream is classified by EPA waste code number Y012, which is a "first third" "soft hammer" waste. Pursuant to Section 268.8 we have made an effort to locate treatment or recovery facilities which provide the greatest environmental benefit.

Because this stream is an organic stream (see attached waste stream chemical description), the greatest environmental benefit would be provided by RCRA-authorized incineration which destroys the hazardous constituents. Since such treatment is available, we have contracted with a RCRA authorized incineration facility for treatment of the waste by incineration. That facility is Rollins Environmental Services (NJ) Inc. (EPA ID Number NJD0532 88239). *no attached sheet*

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Alan Cantara





FY 1989 RCRA COMPLIANCE MONITORING AND ENFORCEMENT LOG  
Initial Evaluation - State Form

Date Submitted to EPA: _____	Submitted By: <u>LMC</u>	New: <input checked="" type="checkbox"/>	Update: <input type="checkbox"/>	Header Sequence #: _____	Enforcement Action Sequence #: _____
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1. EPA ID: (12 Characters) R.I.D.O.9.5.9.7.6.5.4.4 Non-Notifier: ☐ ID # To Be Issued: ☐

2. HANDLER NAME: Clint Hunt

3. SITE ADDRESS: ONE Wellington Rd.  
(street and town) Lincoln RI 02865

4. ACTIVITY TYPE (S): (Check all activity types listed in EPA FOI report for the handler)

- ☒ Generator ≥ 1000 kg ☐ Generator < 100 kg ☐ TSD LDF ☐ Burn-Blend/H.W. Fuel  
☐ Generator 100-999 kg ☐ Transporter ☐ TSD non-LDF ☐ Burn-Blend/Used Oil Fuel

5a. DATE OF EVALUATION: 6 / 11 / 90  
(Month/Day/Year)

5b. AGENCY RESPONSIBLE FOR EVALUATION: State (this form used for State evaluation only)

6. TYPE OF INITIAL EVALUATION COVERED BY THIS REPORT: Type: 1 (Enter one type)  
1 = compliance evaluation inspection (CEI) 6 = citizen complaint 11 = case development  
2 = sampling inspection 8 = Part A withdrawal 12 = O&M inspection  
3 = record review 9 = closed facility 13 = corrective action oversight  
4 = comprehensive GWM inspection (CME) 10 = general (partial)

7. EVALUATION COMMENTS: (Comment in Block 10, below)

8a. CLASS AND VIOLATION AREA: (Enter all that apply)

VIOLATION TYPE	Violations/Areas Evaluated								
	Class of Violation	GWM	C/PC	Financial	Part B	Comp. Sch.	Manifest	Other	Land Ban
I							0	0	0
II							0	0	0

8b. VIOLATION COMMENTS: (Comment in Block 10, below)

9. ENFORCEMENT ACTIONS:

ENFORCEMENT ACTION TYPE	Class (I or II)	Area of Violation (refer to Block 8 above)	Type (use codes)	Date Action Taken	Compliance Dates		Penalty Amount (dollars)		Resp. Agency (use code)
					Scheduled	Actual	Assessed	Collected	
03 = Warning Letter									
04 = Administrative Complaint									
05 = Final Administrative Order									
10 = Informal Action									
11 = Filed Civil Action									
12 = Filed Criminal Action									
13 = Referred to State									
14 = Referred to EPA									
15 = 3008 (h) Initial Order									
16 = 3008 (h) Final Order									
18 = Civil Referral to AG									
19 = Final Court Order									
21 = NON (Federal Facility Only)									
22 = Federal Facility Compliance Agreement									
23 = Federal Facility Referral to Headquarters									

Responsible Agency:  
S = State, X = EPA action in authorized state, E = EPA action in unauthorized state

10. COMMENTS: Company found in full compliance with  
respect to H.W. Mgmt practices

JUL 17 1990





STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF AIR AND HAZARDOUS MATERIALS

291 Promenade Street  
Providence, R.I. 02908-5767

Frank Battaglia  
Waste Management Division  
US EPA, Region 1  
JFK Federal Building  
Boston, MA 02203

17 July 1990

RE : Land Ban inspection of Olin Hunt, Lincoln, RI

Dear Frank:

Please find enclosed a completed Land Ban checklist for the Olin Hunt facility located at One Wellington Road in Lincoln, RI (RID09576544). As indicated on this checklist no violations of 40 CFR 268 were noted.

If you have any questions, please feel free to contact me at 401/277-2797.

Sincerely,

  
James C. McCaughey, Sr Engineer  
Division of Air and Hazardous Materials



Frank Battaglia



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

May 3, 1990

Alderic R. Therrien, Plant Manager  
Olin Hunt Specialty Products, Incorporated  
One Wellington Road  
Lincoln, RI 02865

EPA ID No. RID095976544

Re: Request for Information pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6927, and Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. Section 9604.

Dear Mr. Therrien:

On October 31, 1989, a representative of the Rhode Island Department of Environmental Management (RI DEM) conducted an inspection at Olin Hunt Specialty Products, Incorporated, EPA ID No. RID095976544. The purpose of this inspection was, in part, to determine the facility's compliance with the Land Disposal Restrictions (LDR). The LDR, which was established pursuant to the Hazardous and Solid Waste Amendments (HSWA) to RCRA, applies to facilities that manage certain spent solvents after November 8, 1986, "California list" wastes after July 8, 1987, the first one-third of the listed hazardous wastes after August 17, 1988, and the second one-third of the listed hazardous wastes after June 23, 1989. The "California list" wastes are liquid hazardous wastes containing certain metals, PCBs, and/or cyanides and/or which have a pH  $\leq 2$ , and/or liquid and non-liquid hazardous wastes containing halogenated organic compounds. The remaining listed hazardous wastes will become subject to the LDR in the May 8, 1990 Third Scheduled Wastes Final Rule. Among other things, the LDR requires these facilities to treat their wastes to specific treatment standards prior to land disposal. The LDR also establishes other requirements set forth in 40 C.F.R. Part 268 as well as in the revised regulations of 40 C.F.R. Parts 260-265 and 270. (See 51 Federal Register 40572 (November 7, 1986); 52 Federal Register 21010 (June 4, 1987); 52 Federal Register 25760 (July 8, 1987); 53 Federal Register 31138 (August 17, 1988); 54 Federal Register 26594 (June 23, 1989); and 54 Federal Register 36967 (September 6, 1989)).

In order to clarify certain information obtained during this inspection and to ascertain your facility's compliance status, EPA hereby requests that the information below be furnished within fifteen (15) calendar days of receipt of this letter.





Please be advised that this Information Request is being made pursuant to the authorities of Section 3007 of RCRA, 42 U.S.C. § 6927, and Section 104 of CERCLA, 42 U.S.C. § 9604.

1. Describe all hazardous wastes handled on site, including, but not limited to, spent halogenated solvents (tetra-chloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, etc.) and spent non-halogenated solvents (xylene, acetone, methanol, toluene, etc.). For each hazardous waste handled, this description shall include the following:
  - a) chemical composition of the waste;
  - b) applicable EPA waste code;
  - c) a description of the process(es) which generated the waste;
  - d) any determination by Olin Hunt Specialty Products, Incorporated of whether the LDR is applicable to such waste, including the date the determination was made, the basis for the determination, and the results of the determination (i.e., whether the LDR is applicable to the waste), and documentation of how this determination was made;
  - e) any applicable treatment standard(s) set forth in 40 C.F.R. Part 268, Subpart D; and,
  - f) the treatment method applied to the waste by the treatment facility to which it was shipped.
2. Provide copies of all LDR notifications and/or certifications, as well as accompanying manifests, sent with each shipment of restricted waste after the date that waste became restricted from land disposal, pursuant to 40 C.F.R. § 268.7. Please include in your answer a description of the documents being provided, including the period of time during which such documents were generated, the waste stream(s) (by process and EPA waste code) to which they apply, and the source of these documents (e.g., from Olin Hunt Specialty Products, Incorporated's internal files, or from the files of the treatment, storage, disposal or recycle facility(ies) to which Olin Hunt Specialty Products, Incorporated shipped its waste(s)). If any restricted waste was shipped off site without the required notifications or certifications, please explain why this occurred and provide copies of all manifests sent with such shipments.
3. Provide copies of all demonstrations and certifications submitted pursuant to 40 C.F.R. § 268.8, as well as accompanying manifests, with shipments of waste subject to the provisions of 40 C.F.R. § 268.33(f) (i.e., "soft hammer" waste). Please describe the documents being provided, including the dates such documents were generated, the waste stream(s) (by process and EPA waste code) to which they



apply, and the source of these documents (e.g., from Olin Hunt Specialty Products, Incorporated's internal files, or from the files of the treatment, storage, disposal or recycle facility(ies) to which Olin Hunt Specialty Products, Incorporated shipped its waste(s)). Please provide copies of all manifests sent with any initial shipments of "soft hammer" waste shipped off-site after August 8, 1988 for which demonstrations and certifications were not prepared. If a demonstration and certification did accompany the first off-site shipment of a "soft hammer" waste, but subsequent shipments of such waste were shipped off-site without a certification, please explain why this occurred and provide copies of all manifests sent with those shipments that were not accompanied by certifications.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. Section 2.203(b). You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim. Information covered by such a claim will be disclosed by EPA only to the extent, and by the means of the procedures set forth by 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Please forward the information requested to:

U.S. Environmental Protection Agency  
Waste Management Division  
JFK Federal Building (HRW-CAN3)  
Boston, Massachusetts 02203-2211  
Attn: Stanley Chin

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully to this Information Request, or to adequately justify such failure to respond, within fifteen (15) calendar days of receipt of this letter can result in an enforcement action by EPA pursuant to Section 104(e) of CERCLA, as amended, and/or Section 3008 of RCRA. Each of these statutes permits EPA to seek the imposition of penalties of up to twenty-five thousand dollars (\$25,000) for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001 or Section 3008(d) of RCRA.



If you have any questions with regard to the above, please contact Stanley Chin of my staff at (617) 573-5777.

Sincerely,

*Linda M. Murphy*

*for* Merrill S. Hohman, Director  
Waste Management Division

cc: Thomas Epstein, RI DEM

